

April 26, 2022

VIA ECF

Terri L. Mascherin  
Tel +1 312 923 2799  
TMascherin@jenner.com

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

***Schansman et al. v. Sberbank of Russia PJSC et al.*, No. 1:19-cv-02985-ALC-GWG (S.D.N.Y.)  
– Plaintiffs’ Further Response to Defendant VTB Bank PJSC Concerning Plaintiffs’  
Proposed Motion to Compel the Production of Documents from VTB**

Dear Judge Gorenstein:

In accordance with Your Honor’s April 21, 2022 Order, ECF No. 322, we write briefly on behalf of Plaintiffs to further respond to the April 20, 2022 letter from Defendant VTB Bank PJSC (“VTB”), ECF No. 320, concerning Plaintiffs’ proposed motion to compel the production of documents from VTB. In a response filed on April 21, 2022, shortly before Your Honor’s Order, Plaintiffs explained why VTB’s attempt to indefinitely delay briefing on the proposed motion to compel should be rejected, and why certain representations about the withdrawal of VTB’s counsel were inaccurate. *See* ECF No. 321. Plaintiffs refer the Court to that submission.

In light of Latham & Watkins’ intervening motion to withdraw immediately from representing VTB, Plaintiffs are willing to allow VTB 30 days to respond to Plaintiffs’ Motion to Compel. Plaintiffs propose the following amended schedule for formal briefing of that motion:

- Monday, May 2: Plaintiffs’ opening brief
- Wednesday, June 1 (thirty days after Plaintiffs’ opening brief): VTB’s opposition brief
- Wednesday, June 15: Plaintiffs’ reply brief

To the extent VTB’s request for additional time is construed as a request for an indefinite stay of briefing on this motion until VTB engages replacement counsel, it should be denied.

Respectfully submitted,

/s/ Terri L. Mascherin

Terri L. Mascherin (admitted *pro hac vice*)  
David Pressman

Jason P. Hipp  
JENNER & BLOCK LLP

*Counsel for Plaintiffs*

cc: Counsel of Record (via ECF)